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May 1, 2024

Via ECF and Electronic Mail

Honorable Katherine Polk Failla, USDJ  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007  
(212) 805-0290  
Failla\_NYSDChambers@nysd.uscourts.gov

**MEMO ENDORSED**

Re: *Sircar v. CUNY, et al.*,  
23-CV-06304 (KPF)

Dear Judge Failla:

I hope that all is well with you and yours. We represent the Plaintiff, Dr. Ratna Sircar, in this matter. We write today with the consent of the Defendants to request a thirty (30) day extension of Plaintiff's time to file an amended complaint in this action from May 3, 2024 until June 3, 2024 and an extension of Defendants' time to move or otherwise respond to the amended complaint from May 24, 2024 to July 1, 2024.

Since learning of the decision of the Arbitrator, Plaintiff has diligently been pursuing information concerning her potential pension – the existence and value of which will inform her appetite for further litigation. I have been informed that the relevant pension provider TRS will be able to provide the necessary information in the next two weeks and that Plaintiff is scheduled to meet with her union representative concerning the same on May 14, 2024. Thereafter, the information received will just need to be confirmed by HR at CCNY – at which point Plaintiff should have the necessary information to make an informed decision. Rather than embark on

potentially avoidable motion practice in the interim, Plaintiff respectfully requests that the Court grant this extension. Defendants consent to this request, and there have been no prior applications for the relief sought herein.

Thank you for your time and attention in this regard.

Respectfully submitted,



Ethan Leonhard

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cc: All counsel (Via ECF and Email)

Application GRANTED. Plaintiff shall file her amended complaint on or before **June 3, 2024**, and Defendants shall answer, move, or otherwise respond to the amended complaint on or before **July 1, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 18.

Dated: May 2, 2024  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE